

MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Gary S. Lee
Norman S. Rosenbaum
Jordan A. Wishnew

Counsel for the ResCap Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Post-Effective Date Debtors.)	Jointly Administered
-----)	

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS'
FIFTY-FIFTH OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY – ASSIGNED CONTRACT CLAIMS)**

1. The undersigned hereby certifies that, as of the date hereof, with the exception of the *Opposition of California Housing Finance Agency to Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability – Assigned Contract Claims)* [Docket No. 6216] (the "CalHFA Opposition"), he is not aware of any other answer, objection or other responsive pleading to the relief sought in the following claims objection, filed by the Debtors on December 12, 2013 (the "Claims Objection"):

Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability – Assigned Contract Claims) [Docket No. 6077].

2. The undersigned further declares that he has caused a review of the Court's docket in these cases and, with the exception of the CalHFA Opposition, has not been advised

that any other answer, objection or other responsive pleading to the Claims Objection appears thereon. The deadline for filing responses to the Claims Objection, January 3, 2014, has passed.

3. The undersigned further declares that the Claims Objection has been adjourned as it relates to (i) Hewlett-Packard Company (Claim Nos. 2224, 2226, 2231, 2234, and 2236), (ii) the Federal Home Loan Mortgage Corporation (Claim Nos. 4875 and 4899), and (iii) California Housing Finance Agency (Claim Nos. 4631 and 4632) [Docket Nos. 6210, 6220] (collectively, the “Adjourned Matters”).

4. In accordance with the *Order Under Bankruptcy Code Sections 102(1), 105(a) and 105(d), Bankruptcy Rules 1015(c), 2002(m) and 9007 and Local Bankruptcy Rule 2002-2 Establishing Certain Notice, Case Management and Administrative Procedures* entered on May 23, 2012 [Docket No. 151] (the “Case Management Procedures”), the undersigned submits this Certificate of No Objection pursuant to 28 U.S.C. § 1746.

5. Accordingly, for the reasons set forth in the Claims Objection, the Debtors respectfully request that the proposed order granting the Claims Objection—except as to Claim Nos. s. 2224, 2226, 2231, 2234, 2236, 4875, 4899, 4631, and 4632, which are the subjects of the Adjourned Matters—annexed hereto as Exhibit 1, be entered in accordance with the procedures set forth in the Case Management Procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 7, 2014
New York, New York

Respectfully submitted,

/s/ Norman S. Rosenbaum

Gary S. Lee

Norman S. Rosenbaum

Jordan A. Wishnew

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EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
)	

**ORDER GRANTING DEBTORS' FIFTY-FIFTH OMNIBUS OBJECTION
TO CLAIMS (NO LIABILITY- ASSIGNED CONTRACT CLAIMS)**

Upon the fifty-fifth omnibus claims objection, dated December 12, 2013 [Docket No. 6077](the "Fifty-Fifth Claims Objection"),¹ of Residential Capital, LLC and its affiliated debtors in the above-referenced Chapter 11 Cases, as debtors and debtors in possession (collectively, the "Debtors"), seeking entry of an order, pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 3294] (the "Procedures Order"), disallowing and expunging the Assigned Contract Claims on the basis that such claims relate to contracts for which the Debtors do not have liability because a cure claim was satisfied in connection with the assumption and assignment of such contracts pursuant to the Platform Sale Order, all as more fully described in the Fifty-Fifth Claims Objection; and it appearing that this Court has jurisdiction to consider the Fifty-Fifth Claims Objection pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Fifty-Fifth Claims Objection and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Fifty-Fifth Claims

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Fifty-Fifth Claims Objection.

Objection having been provided, and it appearing that no other or further notice need be provided; and upon consideration of the Fifty-Fifth Claims Objection and the Declaration of Deanna Horst in Support of Debtors' Fifty-Fifth Objection to Claims (No Liability – Assigned Contract Claims), annexed to the Fifty-Fifth Claims Objection as Exhibit 1; and the Court having found and determined that the relief sought in the Fifty-Fifth Claims Objection is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Fifty-Fifth Claims Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Fifty-Fifth Claims Objection is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit A annexed hereto are disallowed and expunged with prejudice; and it is further

ORDERED that Kurtzman Carson Consultants LLC, the Debtors' claims and noticing agent, is directed to expunge the Assigned Contract Claims identified on the schedule attached as Exhibit A hereto so that such claims are no longer maintained on the Debtors' official claims register; and it is further

ORDERED that the following matters relating to the Fifty-Fifth Claims Objection shall be adjourned to the omnibus hearing scheduled for January 30, 2014 at 10:00 a.m. (EST):

- Hewlett-Packard Company (Claim No s. 2224, 2226, 2231, 2234, and 2236);
- the Federal Home Loan Mortgage Corporation (Claim Nos. 4875 and 4899); and
- California Housing Finance Agency (Claim Nos. 4631 and 4632); and it is further

ORDERED that the Debtors are authorized and empowered to take all actions as may be

necessary and appropriate to implement the terms of this Order; and it is further

ORDERED that notice of the Fifty-Fifth Claims Objection as provided therein shall be deemed good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a), the Case Management Procedures entered on May 23, 2012 [Docket No. 141], the Procedures Order, and the Local Bankruptcy Rules of this Court are satisfied by such notice; and it is further

ORDERED that this Order shall be a final order with respect to each of the Assigned Contract Claims identified on Exhibit A, annexed hereto, as if each such Assigned Contract Claim had been individually objected to; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of any claim not listed on Exhibit A annexed to this Order, and the Debtors' and all parties in interests' right to object on any basis are expressly reserved with respect to any claim not listed on Exhibit A annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2014
New York, New York

THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

In re RESIDENTIAL CAPITAL, LLC, et al. (CASE NO. 12-12020 (MG)) (JOINTLY ADMINISTERED)

FIFTY-FIFTH OMNIBUS OBJECTION - NO LIABILITY - ASSIGNED CONTRACT CLAIMS (NON-BORROWER CLAIMS)

Claims to be Disallowed and Expunged						
	Name of Claimant	Claim Number	Date Filed	Claim Amount	Asserted Debtor Name	Asserted Case Number
1	ALLIED PRINTING RESOURCES 33 COMMERCE RD CARLSTADT, NJ 07072	547	09/17/2012	\$0.00 Administrative Priority \$0.00 Administrative Secured \$0.00 Secured \$0.00 Priority \$4,646.59 General Unsecured	GMAC Mortgage, LLC	12-12032
2	Sprint Nextel Attn Bankruptcy Dept Sprint Nextel - Correspondence P.O. Box 7949 Overland Park, KS 66207-0949	286	07/18/2012	\$0.00 Administrative Priority \$0.00 Administrative Secured \$0.00 Secured \$32,498.31 Priority \$0.00 General Unsecured	Residential Capital, LLC	12-12020